

TITLE 326 AIR POLLUTION CONTROL BOARD

DEVELOPMENT OF AMENDMENTS TO RULES CONCERNING VAPOR PRESSURE OF SOLVENTS USED FOR COLD CLEANING DEGREASING IN LAKE, PORTER, CLARK, AND FLOYD COUNTIES #97-8(APCB)

SUMMARY/RESPONSE TO COMMENTS FROM THE SECOND COMMENT PERIOD

The Indiana Department of Environmental Management (IDEM) requested public comment from September 1, 1997, through October 3, 1997, on IDEM's draft rule language. Comments were received by the following party:

Crystal Clean

Following is a summary of the comments received and IDEM's responses thereto.

Comment: We are concerned about the cost-effectiveness of the proposed approach.

Response: The department is interested in any specific information about the expected economic impact of this proposed rule on Indiana businesses. Our research to date shows that, when compared to other regulations, this is one of the more cost effective means of controlling VOC emissions into the atmosphere. Based on implementation of similar rules in other areas of the country, the cost of reducing VOC emissions ranges from two hundred thirty-eight dollars (\$238) per ton to seven hundred seventy-nine dollars (\$779) per ton. Other measures that have been implemented have reduction costs as high as several thousand dollars per ton. In addition to relative cost-effectiveness in achieving VOC reductions, this rule, which is based on material substitution, will generally result in lower compliance costs for individual sources than would be anticipated with the use of emission control devices. The use of emission control devices would require affected sources to invest in initial capital costs, ongoing maintenance, and worker training. IDEM will work with the commenter and any other interested parties to develop additional information about the expected costs of this rule.

Comment: IDEM has a lack of flexibility in considering other methods for achieving its goals.

Response: The rule allows facilities the flexibility to meet the vapor pressure limitations or to select an alternative compliance method provided a demonstration can be made that such an alternative method will achieve like reductions. Because the rule focuses on material substitution (for example, use of lower vapor pressure solvents), facilities may wish to choose this option for compliance. Solvents meeting the limitations of this rule are available in other areas of the country where similar limitations have been implemented. As noted above, IDEM will work with interested parties to provide whatever information will be of interest.

Comment: We request that IDEM include a provision for a variance that can be shown to reduce VOC emissions to a level comparable to the lower vapor pressure solvents.

Response: Variances may be requested under Indiana Code 13-14-8-8 if there is an undue hardship or burden on the applicant.